

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **PAUL HRYWNAK, JR., aka** : Chapter 13
Paul Hrywnak, : Case No. 5:22-bk-01083
Debtor(s), :

PAUL HRYWNAK, JR., :
Movant(s), :
vs. :
SELECT PORTFOLIO SERVICING and : Motion to
All Parties listed on the mailing matrix : Extend Automatic Stay
filed with the Clerk, :
Respondent(s). :

**AFFIDAVIT OF DEBTOR
IN SUPPORT OF MOTION TO EXTEND AUTOMATIC STAY**

I, **PAUL HRYWNAK, JR.**, hereby swear and affirm, under penalty of perjury, that the following is true and correct:

1. I filed four prior bankruptcy cases, but only one, filed on February 3, 2022, docketed with this Court as **5:22-bk-01083** (the “Prior Case”) was pending within the last year.
2. I filed the Prior Case to save my residence from foreclosure, assert a related title insurance claim and address priority and secured taxes due.
3. The Prior Case failed because I was unable to file all the documents required to be filed.
4. In turn, my inability to file the documents was related to transportation and medical issues that prevented my from meeting with my bookkeeper and attorney, specifically:
 - a. I lacked a road worthy vehicle when the Prior Case was filed;
 - b. Shortly after I obtained a road worthy vehicle, I was involved in a motor vehicle accident in which I was injured;
 - c. Subsequently, I suffered a workplace injury involving a crowbar being lodged in my leg.
5. Since the Prior Case ended, I have recovered mobility, engaged a bookkeeper to prepare all required tax returns and obtained a road worthy vehicle.
6. I reviewed and executed all documents required to be filed in this Bankruptcy Case except a Statement of Financial Affairs, for which I will request additional time to complete and file.
7. I confirm that the income and expenses listed on my Schedules I and J are accurate to the extent they can be with my income varying significantly from month to month.

8. I am not simply attempting to postpone a Sheriff's Sale, and in good faith believe that I can save my residence once the impact of a title insurance claim due my residence being partially on real property that I do not own is resolved.

Dated: July 1, 2022

/s/ Paul Hrywnak
PAUL HRYWNAK, JR., Debtor